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REMARKS/ARGUMENTS

Claims 1-59 were pending in the present application. The present response amends claims 1, 2, 6, 8, 9, 14, 34, 37, and 39, leaving pending in the application claims 1-59. Reconsideration of the rejected claims is respectfully requested.

I. Rejection of the Title

The title of the application is rejected as not being descriptive. Applicants respectfully submit that the present title is descriptive, but the title has been amended for purposes of clarity and in order to expedite issuance of the pending claims. The amendment to the title is not intended to alter the scope of the invention or be interpreted as a limitation on the claimed invention.

II. Rejection under 35 U.S.C. §112

Claims 1 and 9 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 1 and 9 have been amended for purposes of clarity, and as such should have sufficient antecedent basis for the recited limitations. Applicants therefore respectfully request that the rejection with respect to claims 1 and 9 be withdrawn.

III. Objection to the Claims

Claim 8 is objected to as being dependent upon itself. Claim 8 has been amended to depend properly from claim 7, as would be obvious in light of the specification and in light of the recitation of corresponding elements. Applicants therefore respectfully request that the objection with respect to claim 8 be withdrawn.

IV. Rejection under 35 U.S.C. §102

Claims 2-8, 10-12, 37, and 39 are rejected under 35 U.S.C. §102(e) as being anticipated by *Laurin* (US Pub. 2002/0107722).

At the outset it is noted that *Luarin* reference is a continuation-in-part application which was file Jan. 10, 2002. This filing date of *Laurin* is after the filing date of the present application under examination. Thus, it appears that the Examiner is taking the position that the teaching

from *Laurin*, which is relied on in the Office Action, was present in the parent application from which *Laurin* is a CIP. In order to expedite prosecution of the present application, and based on the fact that the present claims of the pending application are distinguishable over the *Laurin* reference, the present response will address *Laurin*, and assume for sake of this discussion that it is prior art, but it should be recognized that in fact the teaching relied in by the Examiner in the Office Action, may actually not be prior to the present application, and the Applicant reserves the right to raise this issue in further prosecution if appropriate and necessary. If the Examiner persists in maintaining rejections of the present claims in light of the *Laurin*, then the Examiner is respectfully requested to provide a copy of the underlying parent application from which the *Laurin* reference is a CIP.

Claim 2 as amended recites an apparatus for receiving and processing suggestions, defined by:

- a central portal for receiving suggestions from a submitting party on behalf of a receiving party;
- a plurality of innovation zones within said receiving party to which said suggestions can be routed;
- a mechanism that routes said suggestions to one or more of said innovation zones in response to an interaction with said submitting party; and
- a mechanism for viewing said suggestions to allow peer viewing and/or comment before a final decision is made regarding the suggestions.**

(*emphasis added*). Such an apparatus is not disclosed by *Laurin*. *Laurin* discloses a system “for idea management and development of a structured idea” that allows an employee to submit a “structured response” through a series of templates, by which the idea can be routed to the appropriate “business management” (paragraphs [0005]-[0010]). The idea “may be made public or private to other members of the business” such that a submitter can review “other ideas that have been submitted and approved” in order to “better formulate responses to the template and can identify if there is duplication of the idea presently being considered for submission” (paragraphs [0050]-[0055]). *Laurin* does not, however, provide a mechanism for allowing peers of the submitter to comment on the suggestion as required by Applicants’ claim 2. As such, if an employee in *Laurin* wishes to add something to the suggestion, offer an alternative suggestion, or expand on the suggestion, it is necessary for the employee to go through the series of templates to submit a new suggestion, costing both the company and the employee time, as well as causing unnecessary duplication. Further, there is no way disclosed in *Laurin* for an employee to provide

an alternative viewpoint to a suggestion, such as through a comment added to a suggestion. As *Laurin* does not disclose such limitations, *Laurin* cannot anticipate claim 2. Claims 3-8 and 10-12 depend from claim 2 and also are not anticipated.

Claim 39 as amended recites a similar limitation of “allowing the submitting party to view previous suggestions, such that the submitting party can choose to comment on an existing suggestion instead of submitting a new suggestion.” As discussed with respect to claim 2, *Laurin* does not disclose such functionality. As such, claim 39 cannot be rendered obvious by *Laurin*.

Claim 37 recites an apparatus defined by:

- central portal means for receiving suggestions from a submitting party on behalf of a receiving party;
- a plurality of innovation zone means within said receiving party to which said suggestions can be routed; and
- means for routing said suggestions to one or more of said innovation zones in response to an interaction with said submitting party; and
- means for allowing any of said suggestions to be linked to any other of said suggestions.**

(emphasis added). *Laurin* does not disclose such limitations. As discussed above, *Laurin* allows viewing of previously submitted, “public” ideas. *Laurin* does not, however, allow linking between ideas, such that two relevant ideas can be reviewed together, which can save the reviewer time and can allow for a better decision. As such, *Laurin* cannot anticipate claim 37.

As *Laurin* does not anticipate claims 2-8, 10-12, 37, and 39, Applicants respectfully request that the rejection with respect to these claims be withdrawn.

V. Rejection under 35 U.S.C. §103

a. *Laurin* in view of *Schloss*

Claims 1, 9, 13-30, 32, 34-36, 38, 40-56, and 58 are rejected under 35 U.S.C. §103(a) as being obvious over *Laurin* in view of *Schloss* (US 5,878,233).

Claim 1 as amended recites apparatus for receiving and processing suggestions for a company, defined by:

- a central portal for receiving suggestions from a submitting party on behalf of a receiving party;
- a plurality of innovation zones within said receiving party to which said suggestions can be routed, wherein said innovation zones comprise any of:
 - a point of entry for employees within a specific business unit in a larger entity for submission of suggestions related to said business unit;

- a point of entry for motivated submitters with an idea about how to change a business practice of said company;
- a central point of entry for ideas and suggestions;
- a point of entry for ideas on improving a specific aspect of said company; and
- a point of entry for third party submissions;**
- a mechanism that routes said suggestions to one or more of said innovation zones in response to an interaction with said submitting party;
- at least one central database into which said suggestions are categorized based upon key words;
- a mechanism for viewing said suggestions to allow peer viewing and/or comment before a final decision is made regarding the suggestions;**
- a response module that automatically sends an acknowledgement to said submitting party when a suggestion is submitted by said submitting party, wherein said acknowledgement comprises any of a Web based response and an email message;
- a linking module for linking said suggestions to related suggestions, wherein related suggestions are cross-referenced to minimize entry of duplicate suggestions;**
- an acknowledgement module for automatic emailing of specific types of suggestions to specific areas of responsibility within said company;
- a status module that tracks progression of a suggestion through a review, comment, and approval process; and
- a statistics module that reports cumulative submissions in a predetermined format; wherein said mechanism comprises a page based dialog; and wherein said central portal comprises a Web page.

(*emphasis added*). Such an apparatus is neither taught nor suggested by the combination of *Laurin* and *Schloss*.

As discussed above, *Laurin* fails to teach or suggest a mechanism for allowing peers of a submitter to comment on a suggestion or to link to another suggestion, both of which can save the submitter and reviewer time, and can prevent unnecessary duplication. Further, *Laurin* discloses only submissions by employees, and does not teach or suggest allowing third parties to submit ideas, or how to route and/or handle submissions from third parties. As such, *Laurin* cannot render claim 2 obvious.

Schloss does not make up for the deficiencies in *Laurin* with respect to claim 2. *Schloss* teaches a system for “controlling access” and “providing meta-information about, data located on content servers” such that content can be categorized to allow for “filtering” and controlled access of the “content data” (col. 1, lines 16-19; col. 2, line 48-col. 3, line 12; col.4, line 47-col. 5, line 10). As such, it is respectfully submitted that *Schloss* is non-analogous art. *Schloss* was cited as allegedly teaching “a statistics module” and “a point of entry for motivated submitters” (OA p. 8). It is respectfully pointed out that the statistics module of *Schloss* differs from the statistics module of the present invention, and the *Schloss* does not teach “a point of entry for motivated submitters with an idea about how to change a business practice of said company” but

instead teaches offering “credits for proposed advisories” in order to motivate the advisory service’s reviewers, and has nothing to do with the business practice of a company (col. 7, lines 45-57). Further, *Schloss* does not teach or suggest a point of entry for third party submissions, a mechanism allow peer viewing and/or comment before a final decision is made regarding the suggestions, or a linking module for linking suggestions to related suggestions, such that *Schloss* cannot render claim 1 obvious, either alone or in combination with *Laurin*.

Claims 9 and 13 depend from claim 2. As discussed above, *Laurin* does not teach or suggest providing a mechanism for allowing peers of the submitter to comment on the suggestion as required by Applicants’ claim 2. As discussed above with respect to claim 1, *Schloss* also fails to teach or suggest such a limitation, either alone or in combination with *Laurin*. As such, claim 2, and dependent claims 9 and 13, cannot be rendered obvious by *Laurin* and *Schloss*.

Claim 14 as amended requires a network-based application defined by:

- a central portal for receiving suggestions from a submitting party on behalf of a receiving party;
- multiple points of entry comprising innovation groups within said receiving party to which said suggestions can be routed from said central portal and which can also receive said suggestions directly; and
- a mechanism that routes said suggestions to a most appropriate one or more of said multiple points of entry in response to an interaction with said submitting party; wherein said multiple points of entry comprise any of:
 - an entry portal, which is a single point of entry to said network-based application;
 - a point of entry for employees within a specific business unit in a larger entity for submission of suggestions related to said business unit;
 - a point of entry for motivated submitters with an idea about how to change a business practice of said company;
 - a central point of entry for ideas and suggestions;
 - a point of entry for viewing previously submitted suggestions and allowing a comment to be added to at least one of said previously submitted suggestions in lieu of a submission of a new suggestion;**
 - a point of entry for ideas on improving a specific aspect of said company; and
 - a point of entry for third party submissions.**

(*emphasis added*). As discussed above, neither *Laurin* nor *Schloss*, alone or in combination, teach or suggest limitations including a point of entry for viewing previously submitted suggestions and allowing a comment to be added to at least one of said previously submitted suggestions in lieu of a submission of a new suggestion, or a point of entry for third party submissions. As such, claim 14, and therefore dependent claims 15-30 and 32, cannot be rendered obvious by *Laurin* and *Schloss*.

Claim 34 as amended recites the limitation of “allowing viewing and comment on said suggestions before the suggestions are considered.” As discussed above, neither *Laurin* nor *Schloss*, alone or in combination, teach or suggest such a limitation. As such, claim 34 and dependent claims 35 and 36 cannot be rendered obvious by *Laurin* and *Schloss*.

Claims 38 and 40 recite network-based applications for submitting ideas for improving how a company does business, including the limitation of providing for third party submissions from outside the company. As discussed above, neither *Laurin* nor *Schloss*, alone or in combination, teach or suggest such a limitation. As such, claims 38 and 40, as well as dependent claims 41-56 and 58, cannot be rendered obvious by *Laurin* and *Schloss*.

Applicants therefore respectfully request that the rejection with respect to claims 1, 9, 13-30, 32, 34-36, 38, 40-56, and 58 be withdrawn.

b. *Laurin* and *Schloss* in view of *Ginn*

Claims 31, 33, 57, 59 are rejected under 35 U.S.C. §103(a) as being obvious over *Laurin* and *Schloss* further in view of *Ginn* (US 6,275,811).

Claims 31 and 33 depend from claim 14. As discussed above, claim 14 is not rendered obvious by *Laurin* and *Schloss*, as neither *Laurin* nor *Schloss*, alone or in combination, teach or suggest limitations including a point of entry for viewing previously submitted suggestions and allowing a comment to be added to at least one of said previously submitted suggestions in lieu of a submission of a new suggestion, or a point of entry for third party submissions. *Ginn* does not make up for these deficiencies in *Laurin* and *Schloss* with respect to claim 14, as *Ginn* is cited only allegedly teaching “an incentive module” and/or “an award module” (OA pp. 21-22), related to user feedback on an electronic bulletin board (Abstract; col. 1, line 8-col. 3, line 67), and fails to teach or suggest such limitations. As such, claim 14 and therefore dependent claims 31 and 33 cannot be rendered obvious by *Laurin*, *Schloss*, and *Ginn* in any combination.

Claims 57 and 59 depend from claim 40. As discussed above, claim 40 is not rendered obvious by *Laurin* and *Schloss*, as neither *Laurin* nor *Schloss*, alone or in combination, teach or suggest limitations including a network-based application for submitting ideas for improving how a company does business, including the limitation of providing for third party submissions from outside the company. *Ginn* does not make up for these deficiencies in *Laurin* and *Schloss* with respect to claim 40, as *Ginn* is cited only as discussed above, and fails to teach or suggest

such limitations. As such, claim 40 and therefore dependent claims 57 and 59 cannot be rendered obvious by *Laurin, Schloss*, and *Ginn* in any combination.

Applicants therefore respectfully request that the rejection with respect to claims 31, 33, 57, and 59 be withdrawn.

VI. Amendment to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter to the specification.

VII. Conclusion

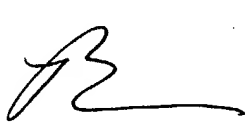
In view of the above, it is respectfully submitted that the application is now in condition for allowance. Reconsideration of the pending claims and a notice of allowance is respectfully requested.

The Commissioner is hereby authorized to charge any deficiency in the fees filed, asserted to be filed, or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Deposit Account No. 50-1703, under Order No. SCHB-3300. **A duplicate copy of the transmittal cover sheet attached to this Response to Office Action Mailed January 20, 2004, is provided herewith.**

Respectfully submitted,

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Dated: April 20, 2004

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